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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
ABILENE DIVISION

IN RE:	§ CHAPTER 13
Philip Robert Meetze, Jr.	§ CASE NO. 10-10234-rlj-13
AND	§
Melissa Puente Meetze	§ HEARING DATE: 1/3/2013
DEBTOR(S)	§ HEARING TIME: 11:00 AM

MOTION TO MODIFY CHAPTER 13 PLAN BASE AFTER CONFIRMATION

1. The Debtor(s), by their attorney, state and represent as follows:
2. That pursuant to General Order 2010-01, IRS income tax refunds in excess of \$2,000.00 for 2011 should be turned over to the Chapter 13 Trustee for the benefit of creditors.
3. That Debtors' excess refund for 2011 is \$1,405.00.
4. That Debtors wish to raise the Chapter 13 plan base by that same amount of \$1,405.00 and raise the unsecured creditors' pool by that same amount, less Trustee's fees. The plan base will change from \$31,500.00 to \$33,360.00.
5. That Debtors agree to a plan payment increase to \$824.00, starting in January 2012, in order to raise the plan base to \$33,360.00.
6. That \$400.00 attorney fees and costs are charged for this modification and are to be paid through the plan by the Trustee.

WHEREFORE, the Debtors move this honorable court to enter an order modifying the confirmed Chapter 13 plan base to \$33,360.00, and to other and further relief to which they may be entitled.

Respectfully submitted,

/s/Pamela J. Chaney  
Attorney for Debtor(s)

CERTIFICATE OF SERVICE

A true and exact copy of the foregoing Motion and Notice of Hearing was served electronically by the ECF System or by First Class Mail on November 6, 2012, on all parties on the mailing matrix:

/s/Pamela J. Chaney  
Attorney for Debtor(s)